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Attorneys for TIMBERWORK, INC.

(erroneously sued as "TIMBERWORK OREGON, INC."),

and EARL BLONDHEIM

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MATSUNOKI GROUP, INC. dba HAIKU  
HOUSES,

Plaintiff,

v.

TIMBERWORK OREGON, INC.;  
TIMBERWORK, INC.; JOAN L. SHUELL;  
EARL MAURY BLONDHEIM; DON  
PAUL; ILENE ENGLISH-PAUL; and  
DOES 1 through 10, inclusive,

Defendants.

CASE NO. CV 08 4078 CW

**STIPULATION AND ORDER TO  
EXTEND CERTAIN DISCOVERY  
DEADLINES AND CASE  
MANAGEMENT CONFERENCE  
AS MODIFIED**

Action Filed: 8/25/08

Trial Date: 5/3/10

Plaintiff MATSUNOKI GROUP, INC. dba HAIKU HOUSES (hereinafter  
"Plaintiff") and Defendants TIMBERWORK, INC. (formerly known as and erroneously  
sued as "TIMBERWORK OREGON, INC."), EARL M. BLONDHEIM, DON PAUL and  
ILENE ENGLISH-PAUL (Plaintiff and Defendants are hereinafter collectively referred to  
as "the Parties"), by and through their respective counsel and *propria persona*, agree and  
stipulate as follows:

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**RECITALS**

1. The Parties filed a Stipulation, which the Court signed, designating the following discovery deadlines and trial dates:

- March 26, 2010: Completion of fact discovery;
- April 8, 2010: Dispositive motions to be heard by this date;
- April 8, 2010: Case management conference;
- April 26, 2010.: Disclosure of identities and reports of expert witnesses;
- June 14, 2010: Completion of expert discovery;
- June 29, 2010: Final pretrial conference;
- July 19, 2010: Trial.

2. Due to the unavailability of the Parties, their counsel and certain witnesses, necessary depositions and other discovery will not be completed by the current fact discovery deadline of March 26, 2010. The Parties thus wish to move the relevant discovery deadlines.

THEREFORE, the Parties hereby stipulate and seek the Court's approval for the following:

**STIPULATION**

The following discovery deadlines and case management conference shall be extended, accordingly:

1. The deadline for completion of fact discovery be moved from March 26, 2010 to April 26, 2010.
2. The case management conference be moved from April 8, 2010 at 2:00 p.m to May 11, 2010 at 2:00 p.m.
3. The deadline for the disclosure of identities and reports of expert witnesses be moved from April 26, 2010 to May 19, 2010.

The deadlines for a dispositive motion hearing, completion of expert discovery, and the dates of the final pretrial conference and the trial will remain unchanged.

1 DATED: March \_\_\_\_, 2010

LEWIS BRISBOIS BISGAARD & SMITH LLP

2  
3 By \_\_\_\_\_

Julian J. Pardini

Alan J. Haus

Rowena C. Seto

4 Attorneys for Defendants TIMBERWORK, INC.  
5 (erroneously sued as "TIMBERWORK OREGON,  
6 INC.") and EARL BLONDHEIM  
7  
8

9 DATED: March \_\_\_\_, 2010

GORDON & REES, LLP

10  
11 By \_\_\_\_\_

Richard P. Sybert

Lindsay Hulley

12 Attorneys for Plaintiff Matsunoki Group  
13  
14

15 DATED: March \_\_\_\_, 2010

DON PAUL and ILENE-ENGLISH PAUL

16  
17 By \_\_\_\_\_

Don Paul

Ilene English-Paul

18 Defendants *Pro Se*  
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**ORDER**

Based upon the foregoing stipulation of the Parties, the Court **HEREBY ORDERS** that the following discovery deadlines and case management conference be extended:

1. The deadline for completion of fact discovery is moved from March 26, 2010 to April 26, 2010.
2. The deadline for the disclosure of identities and reports of expert witnesses is moved from April 26, 2010 to May 19, 2010.

The remaining discovery deadlines and trial dates remain the same, as follows:

3. The deadline for dispositive motions to be heard is April 8, 2010.
4. The deadline for the completion of expert discovery is June 14, 2010.
5. The final pretrial conference is on June 29, 2010.
6. The trial date is July 19, 2010.

**IT IS SO ORDERED. THE CASE MANAGEMENT CONFERENCE WILL REMAIN SET ON APRIL 8, 2010.**

3/18/10

DATED: \_\_\_\_\_



\_\_\_\_\_  
Honorable Claudia Wilken  
UNITED STATES DISTRICT JUDGE  
NORTHERN DISTRICT OF CALIFORNIA